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November 12, 2024

Via ECF

Hon. Lewis J. Liman
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Freeman et al. v. Giuliani*, 24-mc-00353-LJL

Dear Judge Liman:

We write, pursuant to the Court's Individual Practices, to request a two-business day adjournment of our time to file a "motion to modify the Turnover Order to require Plaintiff-Receiver to treat Defendant's New York co-op property as his homestead pursuant to C.P.L.R. 5206." ECF 94 ¶ 4. Per the Court's rule 1(D):

The original date for this filing is Thursday, November 14, 2024. ECF 94 ¶ 4. The requested adjourned date is Monday, November 18, 2024. There have been no previous requests for adjournment or extension of time (and obviously, none granted or denied). Plaintiffs do not oppose this request.

The requested adjournment would affect other scheduled dates, as follows: Currently, Plaintiffs' opposition is due by Monday, November 18, 2024, and Defendant's reply is due by Thursday, November 21, 2024 (ECF 94 ¶ 4). Defendant hereby consents to whatever reasonable adjustments of the schedule that Plaintiffs may request and/or that the Court may fix. This requested adjournment would not affect the Case Management Plan and Scheduling Order.

We respectfully ask the Court to grant this request.

Respectfully submitted,

/s/ Kenneth A. Caruso
Kenneth A. Caruso

cc: Counsel of Record (via ECF)